

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

J&A FREIGHT SYSTEMS, INC., an Illinois Corporation,)	Court No.: 1:14-cv-1581
)	
)	
Plaintiff,)	NOTICE OF REMOVAL OF
)	ACTION UNDER 28 U.S.C. § 1441
v.)	(Diversity Jurisdiction)
)	
TRAVELERS PROPERTY CASUALTY)	CIRCUIT COURT OF COOK
COMPANY OF AMERICA, a Foreign)	COUNTY, ILLINOIS,
Corporation,)	CHANCERY DIVISION,
)	CASE NO.: 14 CH 01141
)	
Defendant.)	

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant, TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA (“Travelers”), by and through its attorneys, pursuant to 28 U.S.C. §§ 1332, 1441(a) and 1446, hereby removes to this Court the state court action described below:

1. On or about January 17, 2014, Plaintiff, J&A FREIGHT SYSTEMS, INC., filed an action in the Circuit Court of Cook County, Illinois, Chancery Division, under Case No. 14 CH 01141, against Defendant Travelers. Plaintiff’s Complaint is attached hereto as Exhibit A and incorporated herein by reference.

2. On or after February 10, 2014, Travelers was served with a copy of Plaintiff’s Complaint.

3. This Notice of Removal is timely filed under 28 U.S.C. § 1446(b)(1) and (2)(B) as it is filed within thirty (30) days after Travelers’ receipt of Plaintiff’s Complaint on or after February 10, 2014.

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332 and is one which may be removed to this Court by Travelers pursuant to the

provisions of 28 U.S.C. § 1441 in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

5. At the time the Complaint was filed, and at all times subsequent thereto, Plaintiff J&A Freight Systems, Inc., was and is an Illinois corporation with its principal place of business in Chicago, Illinois.

6. At the time the Complaint was filed, and at all times subsequent thereto, Defendant Travelers was and is a Connecticut corporation with its principal place of business in the State of Connecticut.

7. The amount in controversy exceeds \$75,000. (See Paragraphs 9 and 24, and the “Wherefore” clauses of Plaintiff’s Complaint).

WHEREFORE, Defendant, TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA, prays that the above-entitled cause, currently pending in the Circuit Court of Cook County, Illinois, Chancery Division, under Case No. 14 CH 01141, be removed therefrom to the United States District Court for the Northern District of Illinois and that this cause proceed in this Court as an action properly removed thereto.

Respectfully submitted,

/s/ Thomas B. Orlando

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TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 6th day of March, 2014.

/s/ Thomas B. Orlando

Thomas B. Orlando